



The New York Times
Company

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September 1, 2022

The Honorable P. Kevin Castel
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Perkins v. The New York Times Company*, Case No. 1:22-cv-05202

Dear Judge Castel,

I write on behalf of The New York Times Company ("The Times") to request an adjournment of the initial pretrial conference currently scheduled for September 12, 2022, at 11:00am.

On August 18, 2022, the Court granted The Times's letter request to file a Motion to Dismiss the Complaint (the "Motion") and set a briefing schedule under which that Motion will be fully briefed on October 14, 2022. Dkt. 17. A ruling on the forthcoming Motion has the potential to resolve this matter in its entirety or, in the alternative, may significantly narrow the issues to be resolved. Thus, in the interest of judicial economy, The Times requests adjournment of the initial conference until after the Court has ruled on the Motion. No previous adjournment has been sought.

I have conferred with opposing counsel and they consent to this request.

Thank you for your consideration.

Respectfully submitted,

Karen A. Chesley

The September 12, 2022
conference is VACATED,
SO ORDERED
JSDJ
9-1-22